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12 **UNITED STATES DISTRICT COURT**
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14 **DISTRICT OF NEVADA**

15 INVEST VEGAS LLC; MDM
16 CONSULTANTS, INC.

17 Plaintiff,
18 v.
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20 21ST MORTGAGE CORPORATION; CAL-
21 WESTERN RECONVEYANCE
22 CORPORATION; NATIONAL CITY
23 MORTGAGE, A DIVISION OF
24 NATIONAL CITY BANK OF INDIANA;
25 COMMONWEALTH LAND TITLE
26 INSURANCE COMPANY; ONTARIO
27 CONDOMINIUM RENTAL SERVICES,
28 INC; HARLEE S. CARTER; LANA
CARTER; DARREN C. BOUTON; DOES I
through X, inclusive; ROE BUSINESS
ENTITIES I through X inclusive.

29 Defendants.
30
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32 Case No.: 2:15-cv-00644-VCF

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34 **STIPULATION AND ORDER TO EXTEND**
35 **PRE-TRIAL ORDER DEADLINE AND**
36 **CONTINUE TRIAL**

37 **(FIRST REQUEST)**

38 Plaintiff MDM Consultants (“Plaintiff”) and Defendant 21st Mortgage Corporation
39 (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record,
40 hereby stipulate and agree that the pre-trial deadlines in this matter be continued by 60 days to
41 allow the Court to resolve Defendant’s pending Motion for Reconsideration, and to allow the
42 Parties to discuss potential resolution of this matter. Specifically, the Parties are requesting that
43 the current deadline to submit the Joint Pretrial Order, currently scheduled for April 5, 2021, be
44 extended 60 days or to after such time as this Court has resolved the pending Motion for
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1 Reconsideration. Though not yet scheduled, the Parties also request that the trial in this matter be
2 continued accordingly. This is the first stipulation of the Parties to continue these deadlines, and
3 the time of trial in this matter. As the relevant timelines have not lapsed, and as this request will
4 allow the parties to discuss settlement potential and allow the Court time to resolve Defendant's
5 pending Motion for Reconsideration, good cause exists for this stipulated request. Further, this
6 Stipulation complies with the relevant provisions of LR IA 6-1(a) and LR 26-4. Accordingly, the
7 Parties propose that the deadline for the Joint Pretrial Order be continued until June 4, 2021, or 30
8 days after the Court announces its decision regarding Defendant's Motion for Reconsideration.

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DATED this 30th day of March, 2021.

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SHUMWAY VAN

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By: /s/ Garrett R. Chase

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GARRETT R. CHASE, ESQ.

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Attorney for MDM Consultants, Inc.

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DATED this 30th day of March, 2021.

HUTCHINSON & STEFFEN, PLLC

By: /s/ Michael R. Brooks

MICHAEL R. BROOKS, ESQ.

Nevada Bar No. 7287

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ORDER

Upon Stipulation of the parties, and for good cause appearing therefore, IT IS HEREBY
ORDERED as follows:

a. Deadline to for Joint Pretrial Order: June 4, 2021.

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

March 31, 2021

Respectfully Submitted by:

SHUMWAY VAN

BY: /s/ Garrett R. Chase
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